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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CAROLYN A. GERIN and MARY
KATHLEEN HUGHES, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

AEGON USA, INC., AEGON
FINANCIAL SERVICES GROUP, INC.,
AFSG SECURITIES CORPORATION,
PFL LIFE INSURANCE COMPANY,
AUSA LIFE INSURANCE COMPANY,
INC., WESTERN RESERVE LIFE
ASSURANCE CO. OF OHIO, and
BANKERS UNITED LIFE ASSURANCE
COMPANY.

Defendants.

Case No. C 06-5407 (SBA)

**STIPULATION AND ~~PROPOSED~~
ORDER GRANTING RELIEF FROM
AUTOMATIC REFERRAL TO
ASSIGNMENT TO ADR MULTI-OPTION
PROGRAM**

DATE: N/A
TIME: N/A
DEPT.: 3, Third Floor
JUDGE: The Hon. Saundra B. Armstrong

1 WHEREAS, this shareholder securities class action was commenced on July 27, 2006;

2 WHEREAS, on September 1, 2006, the Court issued an Order Setting Initial Case
3 Management Conference and ADR Deadlines, and assigned this matter to the ADR Multi-Option
4 Program;

5 WHEREAS, counsel for all of the parties have conferred and agree that this shareholder
6 securities class action, governed by the Private Securities Litigation Reform Act, is not appropriate
7 for the ADR Multi-Option Program, and that a request to the Court for relief pursuant to ADR
8 L.R. 3-3(c) is appropriate;

9 Accordingly, pursuant to ADR L.R. 3-3(c), the parties to this action hereby stipulate, by
10 and through their counsel of record and subject to the approval of the Court, that this action should
11 be removed from the ADR Multi-Option Program.

12 DATED: November 9, 2006

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16 /s/ Rachele R. Rickert

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27
28 STIPULATION AND [PROPOSED] ORDER GRANTING RELIEF FROM AUTOMATIC REFERRAL TO
ASSIGNMENT TO ADR MULTI-OPTION PROGRAM - Case No. C 06-5407 (SBA)

1 DATED: November 9, 2006

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Attorneys for Defendants

* * *

ORDER

Pursuant to the parties' stipulation and pursuant to ADR L.R. 3-3(c), it is HEREBY
ORDERED that this matter is removed from the ADR Multi-Option Program.

DATED: 12-4-06


SAUNDRA B. ARMSTRONG
UNITED STATES DISTRICT COURT JUDGE

AEGON:14200.STIP

DECLARATION OF SERVICE

I, RACHELE R. RICKERT, am the ECF User whose identification and password being used to file this Stipulation and [Proposed] Order re Relief from Automatic Referral to Assignment to ADR Multi-Option Program. In compliance with General Order 45.X.B, I hereby attest that Stephen A. Mansfield has concurred in this filing.

DATED: November 9, 2006

WOLF HALDENSTEIN ADLER FREEMAN
& HERZ LLP

By: /s/ Rachele R. Rickert
RACHELE R. RICKERT